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IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jane Doe LS 634 v. Uber Technologies,  
Inc., et al., No. 3:25-cv-07323-CRB*

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.  
SHORTNACY IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS  
CASES FOR FAILURE TO COMPLY WITH  
PTO 5**

Date: January 16, 2026  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

1 *Jane Doe NLG (N.T.) v. Uber*  
2 *Technologies, Inc., et al.*, No. 3:25-cv-  
07540-CRB

3 *Jane Doe NLG (N.H.) v. Uber*  
4 *Technologies, Inc., et al.*, No. 3:25-cv-  
08109-CRB

5 *Jane Doe NLG 5 (A.H.) v. Uber*  
6 *Technologies, Inc., et al.*, No. 3:25-cv-  
08112-CRB

7 *Jane Doe NLG (N.S.) v. Uber*  
8 *Technologies, Inc., et al.*, No. 3:25-cv-  
08186-CRB

9 *Jane Doe NLG (D.S.) v. Uber*  
10 *Technologies, Inc., et al.*, No. 3:25-cv-  
08258-CRB

11 *Jane Doe NLG 2 (J.C.) v. Uber*  
12 *Technologies, Inc., et al.*, No. 3:25-cv-  
08259-CRB

13 *Jane Doe NLG (M.U.) v. Uber*  
14 *Technologies, Inc., et al.*, No. 3:25-cv-  
08264-CRB

15 *Jane Doe NLG 2 (V.F.) v. Uber*  
16 *Technologies, Inc., et al.*, No. 3:25-cv-  
08545-CRB

17 *Jane Doe NLG (J.O.) v. Uber*  
18 *Technologies, Inc., et al.*, No. 3:25-cv-  
08567-CRB

**DECLARATION OF MICHAEL B. SHORTNACY**

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) Motion to Dismiss Cases for Failure to Comply with PTO 5.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, In Re: Uber Rideshare Cases, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On December 28, 2023, this Court entered Pretrial Order No. 5 (“PTO 5”) in this matter, requiring each Plaintiff to “produce to Defendants a bona fide ride receipt from an Uber trip connected to the alleged incident.” ECF No. 175 at 2. PTO 5 required each Plaintiff whose case was a part of the MDL by February 1, 2024, to produce the receipt (or, if a receipt was not readily available, certain ride information) within 14 days of that date—i.e., by February 15, 2024. *Id.* Each Plaintiff who joined the MDL after February 1, 2024 had to produce the ride receipt or ride information within 14 days of joining. *Id.* at 3.

4. Attached to this declaration as Exhibit A is a table identifying ten Plaintiffs who, as of November 25, 2025, have failed to produce a ride receipt or ride information as required by PTO 5. The Plaintiffs’ deadlines to comply with PTO 5 are identified in the table at Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 26, 2025 in Los Angeles, California.

**SHOOK, HARDY & BACON L.L.P.**

/s/ Michael B. Shortnacy

MICHAEL B. SHORTNACY (SBN: 277035)

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